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ober 23, 2020

December 23, 2020

Via Hand Delivery

Clerk's Office Eastern District of Virginia Albert V. Bryan U.S. Courthouse 401 Courthouse Square Alexandria, VA 22314

Re: Donovan v. Wilkinson, 20-cv-1344

To the Clerk's Office:

We represent defendant Beth Wilkinson in the above-referenced matter. Due to a miscommunication between Ms. Wilkinson and the Intervenor Washington Football Team, four of the color-coded documents that the Intervenor filed with the Court on December 17, 2020, Dkt. No. 95, contain errors in showing which text Ms. Wilkinson agrees should be redacted. We attach here corrected versions of those four documents to replace the versions filed by Intervenor, using the same color-coding scheme as in the original filing (red identifies the redactions that Ms. Wilkinson agrees with Intervenor and Plaintiff are proper under the Court's order on redactions; yellow identifies additional text that Intervenor and Plaintiff request be redacted; and green identifies additional text that only Intervenor requests be redacted). The four corrected documents are:

- The Complaint and its attachments
- Plaintiff's Confidential Memorandum in Support of Plaintiff's Motion to File Under Seal and to Seal Case
- Plaintiff's Emergency Motion for Temporary Restraining Order and Preliminary Injunction and Incorporated Memorandum of Law
- Plaintiff's Reply to Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction

The Intervenor and Plaintiff are aware of this request for correction and substitution of these four mark-ups for the versions previously submitted. Plaintiff and Intervenor take no position on the request for substitution at this time due to insufficient time to review and respond and reserves their rights to assert objections, if necessary, at a later time.

Sincerely,

/s/ Jared Paul Marx

Thomas G. Connolly Jared P. Marx Thomas B. Mason (*pro hac vice*)

Harris, Wiltshire & Grannis LLP

Counsel for defendant Beth Wilkinson